

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

SEP 3 1997

Michael E. Holmes, Treasurer Republican Liberty Federal Campaign Fund 21310 Park Valley Drive Katy, TX 77450

Identification Number: C00269241

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Mr. Holmes:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line \$1(a)(i) of the Detailed Summary Page of your report discloses a total of \$3,455 in contributions from individuals. The sum of the entries itemized on Schedule A, however, indicates the total to be \$3,480. Please amend your report to clarify the discrepancy.

-Please provide the total(s) for Line 11(d), Columns A and B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed

as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR \$104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §8441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Andrea Wilkens

Reports Analyst

Reports Analysis Division

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